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Russell G. Johnson
Harrison County Radio
1240 Loomis Ave.
Des Moines IA 50315

March 21, 2003

Office of the Secretary
Federal Communications Commission
445 12th St. SW
TW-A325
Washington DC 20554

In accordance with the directives noted in the Appendix of the Notice of Proposed Rule Making adopted ~~October~~ 25th, 2000, Harrison County Radio restates its intention to file a construction permit for channel 293A at Woodbine, Iowa (re: MM Docket # 03-36, RM-10431) if allotted, and if authorized, to build a station in a timely manner as provided by FCC guidelines. A copy of the original petition submitted to the Allocations Branch of the FCC is attached. Thanks for your attention to this issue.

Sincerely,



Russell G. Johnson
Harrison County Radio

ATTACHMENT

Harrison County Radio
1240 Loomis Ave.
Des Moines IA 50315

January 18, 2002

Allocations Branch
Room 3 A320
C/o Office of the Secretary TW B204
FCC
445 12th St NW
Washington DC 20554

PETITION TO ADD CHANNEL 293A TO WOODBINE, IOWA

No. of Copies rec'd 074
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This petition is being submitted by Harrison County Radio to add FM broadcast channel 293A (106.5 MHz) to Woodbine, Iowa as its ~~first~~ aural service.

The reference coordinates listed for Woodbine are: N 41 44 18, W 95 42 08. (coordinates listed ~~throughout~~ are in degrees/minutes/seconds format) At ~~that~~ site there is a short spacing to 1st adjacent KIKD, Channel 294C3, Lake City,

Iowa. To alleviate that short spacing, a proposed site restriction approximately 4.3 kilometers west of Woodbine will allow Channel 293A to be assigned to Woodbine while still providing a city grade, 70 dBu signal to the entire community. (The proposed site restriction is N 41 44 03, W 95 45 14, as used here to provide calculations for the table below) Listed below are clearances to other existing licensees or permittees within plus or minus 3 channels where distance separations exceed requirements (as noted in Section 73.207 of the FCC rules and regulations) but are near minimum:

Calls	City of License	Channel Number	Class	Latitude/Longitude	Bearing	Distance from 41 44 03N 95 45 14W (kilometers)	Channel relationship	Required distance (kilometers)
KKCD	Omaha, NE	290	C2	41 12 M N 95 57 12W	195.73	61.5	3rd adjacent	55
KIBZ	Lincoln, NE	292	C1	40 43 40N 96 36 50W	213.01	133.01	1st adjacent	133
KFMC-FM	Fairmont, MN	293	C1	43 37 45N 94 29 00W	25.81	234.86	co-channel	200
KEXL	Norfolk, NE	294	CO	41 55 59N 97 40 49W	278.53	161.539	1st adjacent	152
KIKD	Lake City, IA	294	C3	42 07 14N 94 48 49W	60.77	89.021	1st adjacent	89
KCTY-FM	Plattsmouth, NE	295	C3	41 09 18N 95 45 42W	180.58	64.33	2nd adjacent	42
KDSN-FM	Denison, IA	296	A	42 02 10N 95 19 44W	48.67	46.2	2nd adjacent	31

RECLASSIFICATION OF STATION KEXL FROM CLASS C TO CLASS CO STATUS

The preceding table assumes class CO operation of station KEXL, Channel 294C, Norfolk, Nebraska. This assumption is being made reluctantly. It was hoped that the short spacing to KIKD at the Woodbine center-of-community coordinates could be alleviated by moving away from KIKD, while maintaining a 165 kilometer spacing to KEXL. This proved impossible, since to remedy the KIKD short spacing, the proposed site would then be short spaced to station KIBZ, Channel 292C1, Lincoln, Nebraska.

The proposed site restriction for channel 293A at Woodbine is short spaced 3.46 kilometers to KEXL assuming the former Class C protection standards. (A map of the site restriction is shown in Appendix A.) However, while KEXL is operating at 100kW ERP, its antenna HAAT is at 313 meters, below the 451 meter minimum that has been set by the Commission for new Class C operation. Thus, this petition to add Channel 293A to Woodbine, Iowa will trigger the reclassification procedure adopted by the Commission to change Channel 294 at Norfolk, Nebraska from class C to class CO.

Unfortunately, no other channels were found that would allow allocation of a new Class A FM station within a 16 kilometer radius of Woodbine. This is supported in Appendix B to this petition, attached, which is a preclusion study which demonstrates that no other class A channel was available for Woodbine other than Channel 293. This study also assumes all Class C stations that preclude assignment of a Class A channel at Woodbine to be Class CO, since none of these stations have antenna HAAT above 451 meters. No other channel was available at Woodbine, even using the relaxed CO separation standards for the precluding Class C stations.

FACTS SUPPORTING WOODBINE, IOWA AS THE COMMUNITY OF LICENSE FOR CHANNEL 293A:

Woodbine has a population of 1,564 per the 2000 United States Census. In 1999, Woodbine had 50 businesses, based on statistics from the Iowa Retail Sales and Use Tax Report. Woodbine has its own post office and zip code, 51579. It is home to five churches, the Presbyterian Church of Woodbine, the Reorganized Church of Jesus Christ of Latter Day Saints, the United Methodist Church, the First Christian Church, and the Sacred Heart Parish Center. The town is home to its own school system, the Woodbine Community School District, with students from Kindergarten through 12th grade in attendance. These facts demonstrate a nexus of various community activities at Woodbine.

By adding Channel 293A to Woodbine, the **eventual** licensee will be able to provide service to almost all of Harrison County. Not only will this be Woodbine's first local service, there is currently no radio station assigned to **any** community in this county, which **has a** population of 15,266 according to the 2000 census. If Channel 293A is added to the Table of Assignments, Harrison County Radio intends to file an application for **a** construction **permit** to operate on that Channel once a filing window is announced by the FCC.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell G. Johnson", written in a cursive style.

Russell G. Johnson
Harrison County Radio